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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In Re:

FIRESTAR DIAMOND, INC., et al.,

Debtors.

Chapter 11

Case No. 18-10509 (SHL)

(Jointly Administered)

RICHARD LEVIN, Chapter 11 Trustee of
FIRESTAR DIAMOND, INC., FANTASY, INC.,
and OLD AJ, INC. f/k/a A. JAFFE, INC.,

Plaintiff,

v.

NIRAV DEEPAK MODI, MIHIR BHANSALI,
and AJAY GANDHI,

Defendants.

Adv. Proc. No. 19-01102-shl

**DECLARATION OF NICOLE A. SULLIVAN IN SUPPORT OF MIHIR BHANSALI'S
MOTION TO DISMISS THE FIRST AMENDED ADVERSARY COMPLAINT**

NICOLE A. SULLIVAN, an attorney duly admitted to practice law in the United States Court of the Southern District of New York, states, under penalty of perjury, as follows:

1. I am a partner with the law firm of White and Williams LLP, counsel to Defendant Mihir Bhansali ("Defendant" or "Bhansali") in the above-captioned proceeding. I submit this

declaration in support of Defendant's Motion to Dismiss the First Amended Adversary Complaint (the "Motion").

2. A true and correct copy of the First Amended Adversary Complaint in this matter, dated September 20, 2019, is annexed hereto as Exhibit "A."

3. A true and correct copy of the Adversary Complaint in this matter, dated March 27, 2019, is annexed hereto as Exhibit "B."

4. A true and correct copy of the M.R. Family Trust's bank statement for the period of May 31, 2007 through March 31, 2018 is annexed hereto as Exhibit "C."

Dated: New York, New York
November 5, 2019



Nicole A. Sullivan